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Attorneys for Plaintiff,
Sensa Products (assignment for the benefit of creditors), LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SENSA PRODUCTS (ASSIGNMENT
FOR THE BENEFIT OF
CREDITORS), LLC,

Plaintiff,

v.

ALAN HIRSCH,

Defendant.

Case No. 2:15-cv-07117 VAP (Ex)

**STIPULATION TO VOLUNTARILY
DISMISS COMPLAINT WITH
PREJUDICE PURSUANT TO
F.R.C.P. 41(a)(2)**

[No Hearing Required]

1 **TO THE HONORABLE VIRGINIA A. PHILLIPS, CHIEF U.S. DISTRICT**
 2 **JUDGE:**

3 Plaintiff Sensa Products (assignment for the benefit of creditors), LLC
 4 (the "Plaintiff") and Alan Hirsch (the "Defendant") (collectively, the "Parties"),
 5 hereby enter into this stipulation (the "Stipulation"), based upon the following:

6 **RECITALS**

7 **WHEREAS** on September 9, 2015, the Defendant filed a notice of
 8 removal [Docket No. 1] from Los Angeles Superior Court, case number
 9 BC581772 (the "Complaint");

10 **WHEREAS** on February 1, 2016, the Defendant filed a motion to
 11 dismiss (the "Motion to Dismiss") Plaintiff's fifth cause of action to the
 12 Complaint [Docket No. 15]. The Plaintiff did not oppose the Motion to
 13 Dismiss, and on March 2, 2016, the Court dismissed the fifth cause of action
 14 of the Complaint [Docket No. 17];

15 **WHEREAS** on March 23, 2016, the Defendant filed his answer to the
 16 Complaint [Docket No. 18];

17 **WHEREAS** pursuant to an order entered by the Court on May 2, 2016,
 18 the Defendant was authorized to substitute himself in as his attorney of
 19 record, Pro Se [Docket No. 23];

20 **WHEREAS** jury trial is scheduled for March 14, 2017; and

21 **WHEREAS** the Plaintiff and Defendant have agreed to voluntarily
 22 dismiss the Complaint, in its entirety, with prejudice to avoid the Parties effort
 23 and expense preparing for trial.

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STIPULATION

Subject to a confirming order of the Court, the Parties stipulate as follows:

1. The Complaint shall be dismissed, in its entirety, with prejudice.

Dated: January 27, 2017

LOBEL WEILAND GOLDEN FRIEDMAN
LLP

By: 

William N. Lobel
Michael R. Adele
Beth E. Gaschen

Counsel for Plaintiff, Sensa Products
(assignment for the benefit of creditors),
LLC

Dated: January 26, 2017

By: 

Alan Hirsch, Pro Se

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DECLARATION OF MICHAEL R. ADELE

I, Michael R. Adele, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court and the Courts of California. I am of counsel with the law firm Lobel Weiland Golden Friedman LLP, counsel for the Plaintiff. The following is within my own personal knowledge, and if called upon as a witness, I could and would testify competently with respect thereto. I am submitting this declaration in support of the Stipulation¹.

2. On September 9, 2015, the Defendant filed a notice of removal [Docket No. 1] from Los Angeles Superior Court, case number BC581772 (the "Complaint");

3. On February 1, 2016, the Defendant filed a motion to dismiss (the "Motion to Dismiss") Plaintiff's fifth cause of action to the Complaint [Docket No. 15]. The Plaintiff did not oppose the Motion to Dismiss, and on March 2, 2016, the Court dismissed the fifth cause of action of the Complaint [Docket No. 17];

4. On March 23, 2016, the Defendant filed his answer to the Complaint [Docket No. 18];

5. Pursuant to an order entered by the Court on May 2, 2016, the Defendant was authorized to substitute himself in as his attorney of record, Pro Se [Docket No. 23];

6. Jury trial is scheduled for March 14, 2017.

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¹ Any and all capitalized terms not expressly defined herein shall have the meaning ascribed to them in the Stipulation.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 27th day of January 2017, at Costa Mesa, California.


Michael R. Adele